

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA

Plaintiff,

v.

No. 1:18-CR-02945-WJ

JANY LEVEILLE,
SIRAJ IBN WAHHAJ,
LUCAS MORTON,
HUJRAH WAHHAJ, and
SUBHANNAH WAHHAJ,

Defendants.

DEFENDANT'S UNOPPOSED MOTION TO EXTEND DEADLINE FOR
FILING REPLIES TO RESPONSES TO DEFENDANT LEVEILLE'S
MOTIONS TO DISMISS

Jany Leveille, Defendant, by and through her undersigned counsel Aric G. Elsenheimer and Angelica Hall, moves the court to extend the time for filing her replies to the Government's Responses (Doc # 485 & 487) to Ms. Leveille's Motions to Dismiss (Doc # 468 & 469) by two weeks or until November 28, 2022.

1. Ms. Leveille and the other Defendants are currently pending a setting for a trial date. The parties are in the process of proposing

scheduling timelines to the Court. At the earliest, trial in this case will not begin until the late spring of 2023, and possibly not until the fall of 2023. The parties are in the process of filing pretrial motions.

2. Defendant Leveille filed two Motions to Dismiss (Doc # 468 and 469) on October 19, 2022. The Government filed their Responses (Doc #485 & 487) on October 28, 2022. The current deadline to file a response is Monday, November 14, 2022. Due to the heavy press of cases, undersigned counsel requests an extension of time of two weeks to file replies to the government's responses. Undersigned counsel has a deadline for pretrial motions in *United States v. Torres*, 19-CR-3333 WJ on Monday, November 14, 2022. Trial in the *Torres* case is scheduled for May of 2023. In addition, undersigned counsel has over 30 felony cases in various stages of litigations and requires additional time to complete the replies in this matter.

3. A two-week extension of time would not delay the proceedings in any way.

4. Counsel for the government, Kimberly Brawley, does not oppose this motion.

WHEREFORE, Ms. Leveille, by and through undersigned counsel, respectfully requests that this Court extend the deadline to file her replies until November 28, 2022.

Respectfully submitted,

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/s/ filed electronically November 10, 2022

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